

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

JANET JENKINS, for herself and as next)
friend of ISABELLA MILLER-JENKINS,)
a/k/a ISABELLA MILLER,)
Plaintiffs,)

v.)

KENNETH L. MILLER, LISA ANN)
MILLER f/k/a LISA MILLER-JENKINS,)
TIMOTHY D. MILLER,)
ANDREW YODER, individually and as)
agent for CHRISTIAN AID MINISTRIES,)
INC., CHRISTIAN AID MINISTRIES,)
INC., RESPONSE UNLIMITED, INC.,)
PHILIP ZODHIATES, individually and as)
agent for RESPONSE UNLIMITED, INC.,)
VICTORIA HYDEN, f/k/a VICTORIA)
ZODHIATES, individually and as agent)
for both RESPONSE UNLIMITED, INC.,)
and LIBERTY UNIVERSITY, INC., and)
its related ministry THOMAS ROAD)
BAPTIST CHURCH, INC., LINDA M.)
WALL, individually and as agent for)
THOMAS ROAD BAPTIST CHURCH,)
INC., and DOUGLAS WRIGHT,)
Defendants.)

CIVIL DOCKET NO. 2:12-cv-00184-wks

RESPONSE OF DEFENDANT DOUGLAS WRIGHT
TO PLAINTIFFS' MOTION FOR SERVICE BY
PUBLICATION ON LINDA WALL

Defendant Douglas Wright submits the following response to Plaintiff's Motion for Service by Publication on Defendant Linda Wall (Dkt. 95)("Motion"). While consulted conceptually on the Motion before it was filed, the undersigned was never provided with an advance copy of the Motion or the proposed Order submitted by Plaintiff (Dkt. 96).

Pursuant to F.R.C.P. 10(c), Defendant Wright hereby adopts by reference the response filed by Defendants Liberty University, Inc., Thomas Road Baptist Church, Inc., and Victoria Hyden (Dkt. 97). In addition, Defendant hereby adopts by reference his "Reply Memorandum of

Defendant, Douglas Wright, in Support of His Motion to Dismiss Plaintiffs' Amended Complaint For Lack of Personal Jurisdiction and For Failure to State A Claim Upon Which Relief Can Be Granted," filed April 18, 2013.

Dated at Burlington, Vermont, this 18th day of April, 2013.

Respectfully submitted,

/s/Robert G. Cain, Esq.

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